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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

COLETTE ROBERTSON,

M. No. _____
(18 U.S.C. §§ 2251(a) and
2251(e))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS.:

JOHN ROBERTSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") duly appointed according to law and acting as such.

In or about 2008 and in or about 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant COLETTE ROBERTSON, together with another, did knowingly and intentionally conspire to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a) and 2251(e))

The source of my information and the grounds for my belief are as follows:¹

1. I have been employed as a Special Agent of the FBI for approximately 7 years and am currently assigned to the New York Office. Since February 2013, I have been assigned to the Crimes Against Children Squad, which is responsible for investigating the sexual exploitation of children. I have gained expertise in the conduct of such investigations through daily work related to conducting these types of investigations and the execution of numerous search warrants, including those relating to child pornography offenses. In addition, I have consulted with other FBI Agents and law enforcement personnel who have extensive training and experience in child sexual exploitation investigations and computer forensics. I am also a member of the Eastern District of New York Project Safe Childhood Task Force.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. On July 2, 2013, I and other law enforcement personnel arrested ALBERTO YARD, a man I now know to be romantically linked to the defendant COLETTE ROBERTSON, after executing a search warrant at his residence and recovering an extensive

¹ Because the purpose of this complaint is merely to establish probable cause to arrest, I have not set forth all of the facts and circumstances concerning this investigation of which I am aware.

collection of electronic equipment.¹ A partial preliminary review of the contents of the electronic equipment that was seized from ALBERTO YARD and his residence on July 2, 2013 revealed, among other images of child pornography, a collection of approximately two-thousand images and more than fifty videos depicting four pre-pubescent girls fully nude. I have successfully identified the four children depicted in these images and videos. Several hundred of those images, if not more, depict lascivious exhibition of the pre-pubescent girls' genitals, as the children are posed in sexually suggestive positions while nude in a bathtub. For example, in one of the images, two female children are in a bathtub fully nude. One child, who appears to be approximately 2-3 years old, is sitting with her feet spread apart and her knees in the air, fully revealing her genitals, and she is using her hands to spread her vagina. Also visible in this image is the torso of another pre-pubescent female who is lying on her back with her feet in the air and her legs spread apart, fully revealing her genitals. This child is also touching her vagina. In another image taken in the same bathroom, a pre-pubescent girl is seen sitting with her knees in the air and her feet spread apart, fully revealing her vagina and anus. The child's face is not visible in the image, as the image is focused exclusively on the child's genitals.

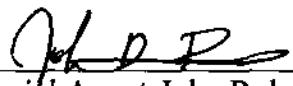
4. On July 24, 2013, I interviewed the defendant COLETTE ROBERTSON. Before I asked the defendant any questions, I informed her that the interview was voluntary, that she was free to leave at any time, that she did not have to answer any questions and that she needed to be truthful. The defendant stated that she understood her

¹ Charges related to the production, possession and receipt of child pornography are currently pending against Alberto Yard, under Magistrate Docket Numbers 13-576 and 13-605.


rights and agreed to speak with me. The defendant admitted to me, in substance and in part, that any images of the four identified pre-pubescent children described above were taken by her at residences located in Manhattan or Brooklyn, New York. More specifically, on multiple occasions in 2008 and on one occasion in 2013, she took nude photographs of the female children in the bathtub, that she directed the female children to spread their legs so that their genitals were fully exposed, that she knew the photographs were pornographic and that she took them for her own and Alberto Yard's sexual gratification. The defendant further admitted that she used a Nokia cellphone that was given to her by Alberto Yard to take the photographs in 2008 and that she gave the cellphone containing the photographs to Alberto Yard afterward, so that he could upload them onto his computer.

5. Based on preliminary analysis and the defendant's statement, the photographs described herein were produced using a digital camera on a cellphone, a memory card and computer equipment which had previously been mailed, shipped and transported in interstate and foreign commerce.

WHEREFORE, your affiant respectfully requests that the defendant
COLETTE ROBERTSON be dealt with according to law.


Special Agent John Robertson
Federal Bureau of Investigation

Sworn to before me this
24th day of July, 2013


THE HONORABLE
UNITED STATES
EASTERN DISTRICT OF
SOUTHERN DISTRICT OF
S/LEWY
NOTARY
PUBLIC